

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

MANDAR MIRASHI,

Plaintiff,

v.

JOHN DOE,

An unknown individual(s),

v.

521.99931468 Bitcoin,

***In rem* Defendant,**

v.

**FixedFloat, Kraken, ChangeNow, exch.cx,
TradeOgre and John Doe 2,**

Relief Defendants.

Case. No.

**DECLARATION OF PLAINTIFF'S
COUNSEL REGARDING SERVICE
PURSUANT TO FRCP 65 (b)(1)(B)**

1. My name is Adam Gonnelli and I am counsel for plaintiff Mandar Mirashi in the above-captioned action.
2. I make this Declaration pursuant to Federal Rule of Civil Procedure 65(b)(1)(B) governing Temporary Restraining Orders issuing without notice.
3. I have not made any attempt to serve the John Doe defendant who stole Mr. Mirashi's Bitcoin for two reasons.
4. First, Mr. Mirashi does not know the identity of John Doe.
5. Second, alerting John Doe that Mr. Mirashi is seeking to require the Relief Defendants and other recipients to freeze his stolen Bitcoin would likely prompt John Doe to take more extreme measures than he already has to conceal and dissipate the stolen Bitcoin.

I make this Declaration under penalty of perjury under the laws of the State of New Jersey and the United States.

Dated March 11, 2025

A handwritten signature in blue ink, appearing to read 'Adam Gonnelli', is written over a horizontal line.

Adam Gonnelli